



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

January 21, 2022

Via ECF

The Honorable Valerie E. Caproni  
United States District Judge  
Southern District of New York  
United States Courthouse  
40 Foley Square, Courtroom 443  
New York, New York 10007

**Re: United States v. Gomez and Younes Arboleda, 18 Cr. 262 (VEC)**

Dear Judge Caproni:

The parties jointly write pursuant to the Court's December 8, 2021 Order. (Dkt. 91). Since the Government's last update on December 3, 2021, the Government has produced approximately 38 additional transcripts to the defendants. In addition, the Government is preparing to file its opposition to the defendant's pretrial motions on or before February 11, 2022. The defendants report that they are continuing to review the discovery produced by the Government and have had their ongoing review interrupted by COVID-19 and quarantine issues at their prison facility.

Given the status of the case, the parties respectfully submit that the upcoming status conference be adjourned to a date and time convenient for the Court after the parties have completed their pre-trial briefing. If the Court adjourns the conference, the defendants consent to an exclusion of time through the new date, under the Speedy Trial Act, 18 U.S.C. § 3161, so that defense counsel can continue to review the discovery material, because the defendants' motions are pending, and due to the COVID-19 pandemic.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

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cc: Defense counsel (by ECF)